



Mr. Tom Wheeler  
Chairman  
Federal Communications Commission  
425 12<sup>th</sup> Street SW  
Washington, D.C. 20554

November 30, 2016

Mr. Chairman and Commissioners,

Collectively, we represent the Emergency Management Offices of 15 of the most populous jurisdictions in the United States covering almost 30% of the population. Several of us have participated in this proceeding, both the CSRIC process and the Commission's NPRM, since its beginning. We write today to voice our concern that a device-assisted geo-targeting capability timeline and requirement were not included in the Commission's September 29<sup>th</sup> Wireless Emergency Alert (WEA) Report and Order, but instead referred to the Commission's accompanying Further Notice of Proposed Rulemaking for additional consideration. This capability is among many important issues under consideration by the Commission such as expanded language, multi-media and the many-to-one option.

While we applaud the Commission's commitment to "adopting even more granular, handset-based, geo-targeting requirements," we strongly believe this work needs to be completed in tandem with the upgrades announced in the Order.

We believe that more precise geo-targeting, enhanced by incorporating the intelligence in our handsets (and, we note, the kind that is used by countless Apps, like Uber, each day), will save lives. Moreover, such a move will engender system trust amongst both alert originators and the public. Precisely targeted messaging means that alerts and warnings can be personalized to a very high degree reducing, if not eliminating, recipient confusion.

A robust public record including commentary from public safety officials, the wireless industry, and academia shows that device assisted geo-targeting is not only technologically feasible but also addresses many of the issues.

The ability to precisely target at-risk populations while minimizing disruption to others will give emergency managers and other alert originators the confidence to use WEA as the WARN Act

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intended. As Commissioner Pai stated, "enabling devices to screen emergency messages and only allow the relevant ones through, this approach would allow public safety officials to target information to specific geographic areas. And it would advance WEA as a platform by reducing 'alert fatigue'."

Events in New York City, Orlando, Paris, Louisiana, Texas and elsewhere highlight the importance of precisely targeted public information in generating positive public safety outcomes. Adverse events, natural and man-made, are an unfortunate part of our shared reality. We need an alerting system that is up to those challenges.

Many of us have stated on the record, in meetings, and throughout the CSRIC process, that the recommendations concerning device assisted geo-targeting in *Wireless Emergency Alerts – Recommendations to Improve Geo-Targeting and Offer Many-to-One Capabilities*, Recommendation 3 in particular, are the most important and timely changes to WEA under consideration. Simply put, device based geo-targeting provides the lightest lift with the biggest return.

The record is clear – device based solutions to improve granularity are feasible and should be moving forward on the same timeline as the other WEA upgrades. The 42-month timeline that was negotiated with the industry as part of the CSRIC process should have started with the adoption of the CSRIC report and the Commission's Order. Our country deserves to have this capability incorporated into the WEA service with extreme haste.

Sincerely,



Barb Graff  
Chair, Big City Emergency Managers  
Director, Office of Emergency Management, Seattle

 12/2/16

Ron Prater  
Executive Director  
Big City Emergency Managers

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